

**INSPECTION REPORT:**

**BY W. Douglas Smith,**

**June 1, 1993**

# **ESD TSCA INSPECTION REPORT**

**Burlington Environmental, Inc.  
1011 Western Ave., Suite 700  
Seattle, WA 98104**

**5-27-93**

**FACILITY**

**ADDRESS:**

**Burlington Environmental, Inc.  
1011 Western Ave., Suite 700  
Seattle, WA 98104**

**SITE**

**ADDRESS:**

**Burlington Environmental, Inc.  
734 S. Lucile  
Seattle, WA 98108**

**INSPECTION**

**COMMENCED:**

**5-27-93 @ 0840 hours**

**SITE**

**CONTACTS:**

**John D. Stiller, Environmental Compliance Manager,  
(206) 654-8153  
David L. Aubry, Division Manager, (206) 654-8147  
Ryan Weller, Environmental Compliance Specialist,  
(206) 762-3362  
Gary Coil, Plant Manager, (206) 762-3362**

**INSPECTION**

**TEAM:**

**W. Douglas Smith, Sr. Compliance Investigator,  
(206) 553-6700  
Joseph Dillon, Civil Investigator, (206) 553-6706  
John Pavitt, EPS, (907) 271-3688**

**SITE**

**BACKGROUND:**

Burlington Environmental, previously known as Chemical Processors (ChemPro) is one of the largest hazardous waste handlers in the region. They are transporters, storers and disposers of industrial and household chemical wastes. They have notified EPA that they are a storer of PCB wastes. Their RCRA hazardous waste and TSCA storer identification number is **WAD00812909**.

**OPENING**

**CONFERENCE:**

All of the inspection team introduced themselves and showed their credentials. John Pavitt did not have credentials but had proof of employment with EPA. Messrs. Stiller, and Aubry were present. Messrs. Coil, and Weller arrived approximately 10 minutes later and introduced themselves to the inspection team.

I explained the scope and sequence of the inspection and issued the Notice of Inspection and Notice of Confidentiality. There were no objections to the proposed itinerary. I identified the documents we would like to review and those we would like to have copies of to take with us. While the documents were being gathered by the clerical staff, we moved to the hazardous waste handling yard and storage buildings across from the offices on S. Lucile street.

**RECORDS**

**INSPECTION:**

I had prepared a document request list in my office. I reviewed it with Messrs. Stiller, Aubry, Coil and Weller and identified those documents that pertained to their facility. They then signed the master sheet and made a facsimile for them to work from. (See attached ESD "Document request for TSCA") Mr. Aubry agreed that the documents that were not easily available at the time of the inspection would be made available within 10 working days from the date of this inspection.

The following documents were reviewed or copied and taken:

1. Copies of the "Annual Document" for 1991, and 1992 to the present thought the completion date for 1992 was not until July. They agreed to give me as much as they had.
2. Description of PCB storage areas. There was some new construction and area from one designated area was being stored in another designated area. No material was stored in areas not designated for PCB storage.
3. SPCC plan which is part of the company contingency plan.
4. Certifications for PCB transformer disposals May 1992 through May 1993.
5. Copies of all manifests for the PCB items received & shipped May 1992 through May 1993.

(Note: This was later modified per agreement between Burlington Environmental staff and William Hedgebeth to include only manifests for the last month.)

6. Copies of all daily inspection records of all PCB Articles and PCB containers in each storage area.

**FIELD  
INSPECTION:**

The inspection team signed the register in the office of the waste handling area. The inspection team identified the areas of the yard and buildings identified in the site diagram provided to us. There were a total of ten areas where PCBs were stored or routinely handled. These are highlighted in yellow on the site diagram attached to Mr. Pavitt's notes (See attached notes by Mr. Pavitt).

In Bay C-7B I observed drum T4463-8. It had the following information written on its Hazardous Waste label:

- 502 lbs.
- Report # 112
- Generator: Burlington Environmental
- Date of Accumulation **3-26-92**



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- Paints and Thinners
- Flammable
- D001, D008
- WAD000812907

*Note: It was later verified that the year of the date that appeared on the drum had been poorly written and was actually 3-26-93 and not 3-26-92 as originally observed in the field. A copy of the Waste Process Form was obtained for the drum and the date 3-26-93 was verified.*

In Bay C-7C I observed Drum 17909-002. I observed the accumulation start date 6-25-92. It was dated as received at the yard 4-29-93. The contents were identified as mixed solvents. There was less than a month remaining before the drum contents require certification of disposal. Mr. Aubry said they were aware of the drum and had plans already made to insure that disposal was carried out in time.

The inspection team walked through all the warehouses, storage areas and the entire yard area. No other PCB materials were observed to be stored or in transit anywhere other than in the designated PCB areas.

None of the PCB material or PCB materials in drums were observed that did not have the required M<sub>1</sub>, date of accumulation, and other identification for tracking purposes specific to Burlington Environmental's container management procedures.

No spills or leaks were observed.

There were PCB M<sub>1</sub> markers over every entrance to buildings that contained PCB storage areas.

**CLOSING**

**CONFERENCE:**

Messrs. Stiller, Aubry, Coil, and Weller were present with the inspection team during the closing conference. I reviewed the

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documents they were to provide to Mr. Hedgebeth within the next 10 working days. We reviewed the information on the two drums that had dates that appeared to be over or near the one year storage limit. I expressed satisfaction that the drum I had observed to have the date 3-26-92 was actually documented to be a drum that should have been more clearly identified as being dated 3-26-93. Mr. Aubry said that the year had been corrected on the drum and 93 was now more legible.

**POTENTIAL  
VIOLATIVE  
ISSUES:**

The inspection team did not note any obvious violations at the time of this inspection though a thorough records review was not completed and will be performed at a later date in EPA offices.

**ATTACHMENTS:**

- A. Notices of inspection
- B. Notebooks
- C. Facility documents
- D. *John Paerlt notes*

*June 4, 1993*  
DATE

*W. Douglas Smith*  
W. Douglas Smith, Sr. Compliance Investigator